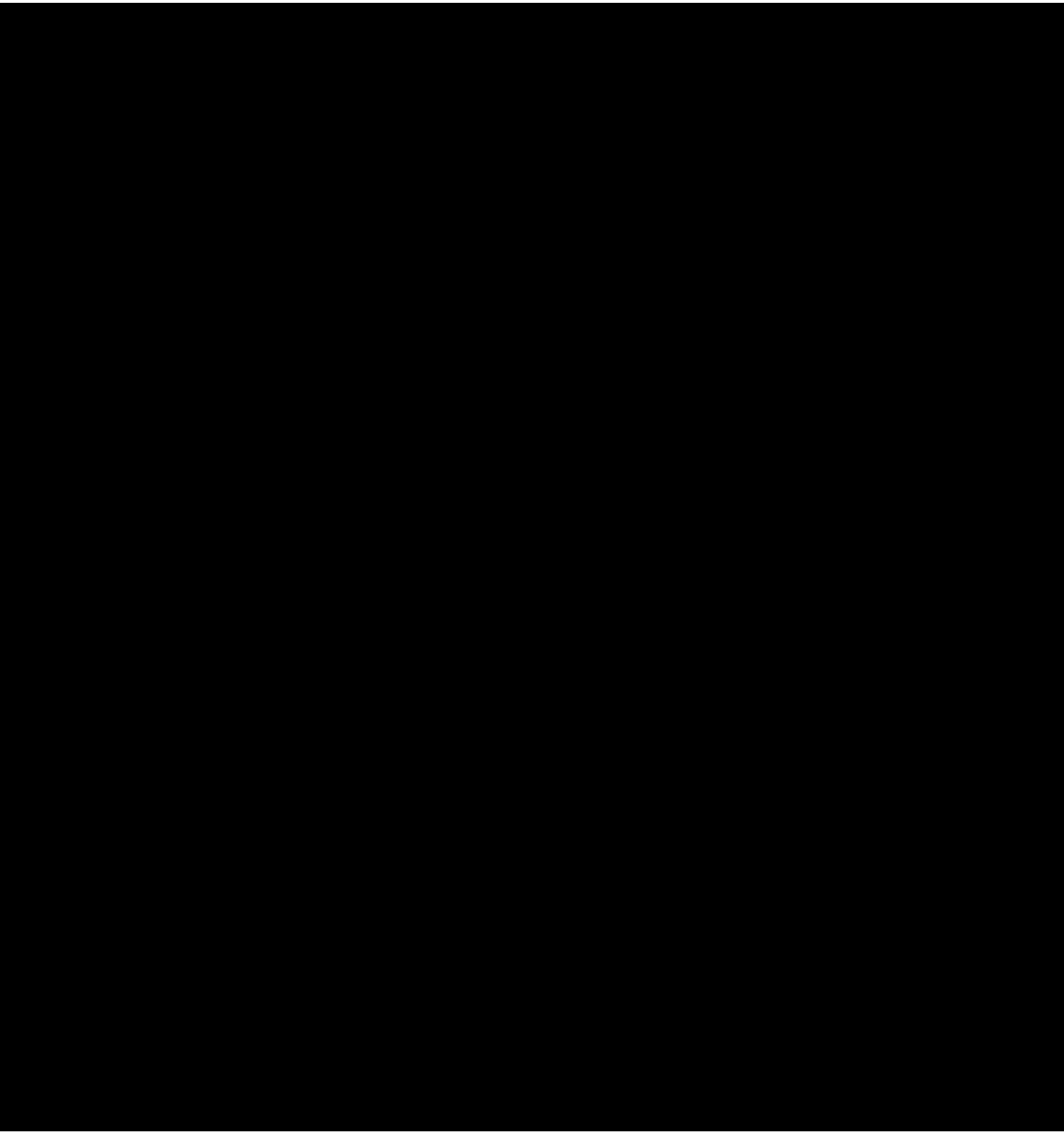


Exhibit 11



From: **linda** <linda@billediodato.com>
Date: Tue, Apr 22, 2008 at 8:13 AM
Subject: Re: photos
To: Lucia Fiala <fuersten@gmail.com>

Lucia,

You are correct in that there is no box to check on the model release. The industry standard model releases do not have a box to check off different usages for imagery.

I would never assume or imply that you want your images sold or not sold. This is not my business... We are very upfront with all the models about what the images could be used for or not used for. All seasoned models read over the contracts, either sign them or not and can choose to mark them up as they wish.

I have forwarded all correspondence to Corbis and our Company Lawyers, Sanders Ortoli Vaughn Flam & Rosendstadt LLP. in the event you have any other questions for them. Feel free to contact Corbis with regard to the release. They could probably answer more of your questions than I can.

Respectfully,
Linda Hilfiker

Producer
Bill Diodato Photography, LLC.

On Apr 21, 2008, at 7:56 PM, Lucia Fiala wrote:

Hello Linda,

I do not see any box on the contract, that I could have checked, so you won't sell my images everywhere...I'm attaching the contract, it is not there...So please don't make it sound as if I wanted my images to be sold!

And I believe you, that there were a few models, that decided not to sign, because you didn't really tell us, what we were signing! (and a contract made under the German law???)

All I ever wanted to do was a few ads for free across the Europe, as you can imagine!

Thank you,
Lucia

On Mon, Apr 21, 2008 at 12:23 PM, linda <linda@billdiodato.com> wrote:

Hello Lucia,

This is Linda, Bill's Producer. Bill is out of town shooting and passed the below emails on to me last evening.

I would like to start out by saying; that Bill does not deal with the model releases.

Colleen, myself and Corbis deal with all of Bill's releases.

It is standard practice for our office to ask the models for a model release. If one of us is not on set we ask that one of Bill's assistants ask for a release. This release is scanned, along with a photo from given shoot, and put into our archives. Each model is given the choice to either sign the release or not. There have been very few models that have chosen NOT to sign a release as this is a pretty straight forward model release.

I would like to assure you that Bill has not scammed you nor has anyone in our office. Bill has the utmost respect for his clients, the models he has photographed and his crew members.

I would appreciate it if you could pass on all other correspondence to Colleen or myself. We understand your need to express your feelings to Bill, but he does not deal with issues such as; budgets, invoicing, releases, contracts or legalities. Bill's responsibility to his clients and our office is to create beautiful photographs!

Should you have any further questions or concerns, please contact Linda or Colleen at 212-563-1724.

Respectfully,

Linda Hilfiker

Producer

linda@lhproduction.com

On Apr 20, 2008, at 11:20 PM, Lucia Fiala wrote:

Bill,

I am very aware you did everything by the book. You knew exactly what you were doing. At the same time, to me, it is very strange, that the contract you gave me to sign (or your assistant) was written according to German law. And that's why I said you scammed me.

Especially because this all happened during a photoshoot for a magazine through the agency, not a test or anything.

I know you call yourself an artist with a great reputation, my own experience is, however, different. I've never met a photographer that did anything even remotely similar...

Anyways, thank you for "being forthcoming with the information",

Lucia

On Sun, Apr 20, 2008 at 8:53 PM, Bill diodato
<bill@billdiodato.com>

wrote:

Lucia,

I have forwarded this to my producer Linda Hilfiker and my stock agent Corbis who sell the images. I am fairly certain I did not ask you for a release, I believe it was

my

first assistant who asked for a release.
I never deal with stock or anything related to it. My office deals with this (if you would like to contact either Linda or Colleen at the office 212-563-1724 they would be happy

to

try and help you with this.)

Furthermore, I am sorry you feel the way you do but we have done

everything

by the book. We own the rights to the image and I have been informed that my agent can sell the image for anything they would like. As a courtesy to you (based on your displeasure) I offered to not sell

the

image for any sensitive issue topics. I would appreciate it if you would refrain from saying "I

scammed

you" or mislead you. It is not forged nor is it tampered with so please refrain from this slanderous communication. I have a great reputation

and

do not appreciate you negative comments and attacking nature. I have

been

very forthcoming with information, this is not the behavior of a scam artist...

Finally, models that sign a release will cross out what he or she does

not

image

wish the image to be sold/used for
and you did not do so. Hence your

and many others are being offered
for sale by my stock agent.

Respectfully,
Bill Diodato

On Apr 20, 2008, at 6:51 PM, Lucia
Fiala wrote:

Bill,

I do not have the image in question,
since I never had it, and the
hard copy from the magazine is at
home in Slovakia...

It was a cheezy smile image in a
yellow top that you took while
shooting for the "Good
Housekeeping". As much as I
remember from that
shoot you asked me to sign the
release so you can use the images
for
your web site...the scan of the
contract is attached, although the
only readable part are the
signatures...

I am thankful, that you do not use
the images for the cigarettes,
drugs, etc....Finding myself in the ad,
that basically says, that I
look good for being 97 years old
because I drink the mineral water
was
humiliating. Not to mentioned, that I
wasn't paid for it, because you
scammed me...

I'm just shocked that I let this happened to me, not to mentioned, that when my lawyers started to investigate in the matter, since I had no idea where the picture in the ad comes from, the mineral water company started to threaten me that they'll take me to the court, as they claim, I harmed the good name of the company...

Lucia

On Sun, Apr 20, 2008 at 1:14 AM,
Bill diodato <bill@diodato.com>

wrote:

Hello lucia,

Assuming your image is being sold in the stock arena as you have

mentioned,

you should know that many agents contact photographers looking for images that are sitting in the filling cabinets so they may sell them. It is a reality of our ever changing business. Please send me the image in question and I will look into this ASAP.

I will also assure you that if my image of you has been made available

for

sale by a stock agent it can never be sold for any sensitive matter such

as

fur, drugs, alcohol, medicine, cigarettes or any sex related issues.

that

All of my images are barred from these type of sales, so no I am not

desperate.

Where do you live? Are you in the US?

Please send me a scan of the image you are referring to.

Thank you,
Bill

On Apr 19, 2008, at 11:45 PM, Lucia Fiala wrote:

Hi,

I didnt know you were so desperate, that you chase the models at the photoshoots with some strange contracts written under German law and then sell the pictures to the European agencies....You looked as a decent photographer....

Anyways, can you tell me where everywhere you sold my pictures to? So

I can spare myself the problems and the humiliation when trying to trace the origin of the pictures that appeared in a major ad for a mineral water in the Czech and Slovak Republic?

Thanks,
Lucia

<contract.pdf>

Bill Diodato Studio
212.563.1724
fax- 212.594.3603

<contract.pdf>

Exhibit 12

Date: Wed, 1 Apr 2015 14:22:03 -0400
Subject: Re: Image used on CorbisImages.com
From: fuersten@gmail.com
To: elodiepass@hotmail.com

Hi Elodie,

thank you again for your email. hope all is well with you!

yes, actually, I will fwd you my communication with that "photographer". I found out in 2008, when at home (in Slovakia) i found myself promoting a mineral water. I had no idea what the hell was going on and contacted the mineral water company through my lawyer at home. they nastily came back to me telling me that they bought the image and treating me to sue for defamation (really interesting). when I got back to Bill, he sent me something I signed in 2006 when shooting Good Housekeeping with him - I will fwd you the whole conversation I had with him at that time, quite interesting.

that being said, I actually did sign smth - i was quite stupid and he gave me this release at the photoshoot claiming he needed it for himself. since it has been quite some time, i do not remember exactly what he explained to me, if i knew what he'll do, i would never sign anything. that is why i cannot really do anything legally against him, although believe me, I would LOVE to!

I had been working as a model for 12 years, but this never ever happened to me except for this idiot...

so please let me know if i can help you anyhow, but unfortunately i cannot sue him as well...;(

regards,

Lucia

On Wed, Apr 1, 2015 at 10:12 AM, Lucia Fiala <fuersten@gmail.com> wrote:

Dear Elodie,

It is nice hearing from you! I will reply over the lunchtime, I cannot now.

Talk to you soon,

Lucia

On Wed, Apr 1, 2015 at 9:46 AM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Lucia

Please forgive my intrusion. I requested your email address from Meghan at

Decorum because I am litigating against a photographer whom is using a few of my photographs illegally - one of which has ended up being used for the Brilliant Distinctions Program campaign (ran by Allergan, the umbrella company for Botox, Juvederm, and a few more plastic surgery related brands...) - yet while I was flipping through his catalog of royalty-free pictures online to account for how many pictures he had of me on his stock photography platforms, I came across 7 pictures of you. Below is one of them.

The lawyer that I retained to litigate against this photographer is telling me [REDACTED]

[REDACTED] have you ever shot with a photographer named Adrianna Williams, presumably based in LA? ...I have not. Yet, "she" is selling my pictures royalty-free on Getty Images and yours on Corbis. Go to Corbisimages.com and flip through, you will see the pictures that I am referring to (there are some on page 8, 11, 13, 14 and 15 if I am not mistaken).

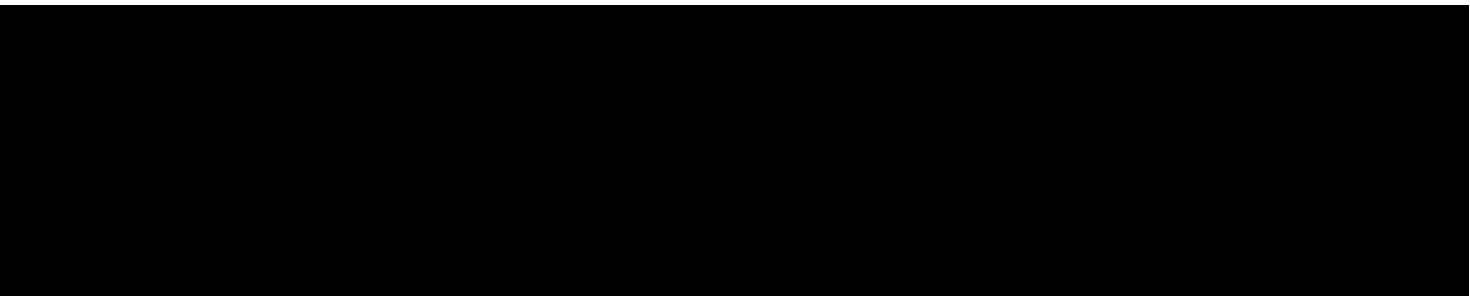
Now, have you ever shot with Bill Diodato? ...I have and he was the photographer on both jobs that the pictures being sold for stock in my case have been extracted from.

[REDACTED]

Sincerely,

Elodie.

Sent from my iPhone



From: elodiepass@hotmail.com
Subject: Re: Image used on CorbisImages.com
Date: Mon, 13 Apr 2015 09:06:31 -0400
To: fuersten@gmail.com

Thank you Lucia.

I also wanted to advise you to check whether all the pictures of you that were on sale on Corbisimages were shot the day that you signed a voucher because Bill is selling pictures of me from two independent bookings with the release that I had originally signed - which is were he messed himself up.

Have a very good week,

Elodie.

Sent from my iPhone

On Apr 13, 2015, at 7:51 AM, Lucia Fiala <fuersten@gmail.com> wrote:

Elodie,

I am very sorry for not replying to this earlier!

Yes, there are many similarities, he pretty much told me the same. When you look at that release that I signed, to me it looks put together and photocopied later, however, at that time, it was very hard to fight back.

There might be some statutory limits for me to take this further, i am not sure - it has been forever... I do not have a release and it will be hard to get it for me as i am not on a good terms with my former agency (however, it was a shoot for a good housekeeping and i am sure there is some record of that somewhere).

However, feel free to share my conversation with your lawyer, i would be happy if it helps!

Cheers,

Lucia

Sent from my iPhone

On Apr 1, 2015, at 9:44 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Lucia,

As you can tell, there are similarities between your case and mine. Bill Diodato made me sign a voucher on a light test that we were doing for Clinique Cosmetics, he also claimed that it was for his personal promotion and then proceeded to sell both the pictures from said shoot and those from a waist down shoot that took place years later via a different agency to Getty Images for a profit.

Now, I have spoken to my lawyer about your case and he says



Also, I was wondering if there was any mention of Bill Diodato's legal representation on the release that you signed. You see, I do not have a copy of mine which is what makes my case tricky because the voucher that Bill Diodato has used to sell my images has been altered to suit the product of both shoots; in other words: Bill added stuff to the object line to make it seem like I signed one voucher for both jobs even though they were shot 4 years apart for two distinct clients and via two very distinct agencies.

Do you mind if I forward the communication between you, Bill and his producer to my lawyer -just so he has an idea of the character that we are dealing with?

I will keep you in the loop regarding how we can join forces after I have a proper interview with my lawyer tomorrow.

Thank you for sharing your story with me.

Elodie.

PS: reading Bill's responses to you in the thread makes me want to contact him and put him in his just place. The simple fact that he is using a pseudo to sell our pictures to image banks is a clear sign of his dishonesty. This is making me so mad at him.

Sent from my iPhone

On Apr 1, 2015, at 2:22 PM, Lucia Fiala <fuersten@gmail.com> wrote:

Hi Elodie,

thank you again for your email. hope all is well with you!
yes, actually, I will fwd you my communication with that
"photographer". I found out in 2008, when at home (in Slovakia) i
found myself promoting a mineral water. I had no idea what the
hell was going on and contacted the mineral water company
through my lawyer at home. they nastily came back to me telling
me that they bought the image and treating me to sue for
defamation (really interesting). when I got back to Bill, he sent me
something I signed in 2006 when shooting Good Housekeeping
with him - I will fwd you the whole conversation I had with him at
that time, quite interesting.

that being said, I actually did sign smth - i was quite stupid and he
gave me this release at the photoshoot claiming he needed it for
himself. since it has been quite some time, i do not remember
exactly what he explained to me, if i knew what he'll do, i would
never sign anything. that is why i cannot really do anything legally
against him, although believe me, I would LOVE to!
I had been working as a model for 12 years, but this never ever
happened to me except for this idiot...

so please let me know if i can help you anyhow, but
unfortunately i cannot sue him as well...;(

regards,
Lucia

On Wed, Apr 1, 2015 at 10:12 AM, Lucia Fiala
<fuersten@gmail.com> wrote:

Dear Elodie,

It is nice hearing from you! I will reply over the
lunchtime, I cannot now.
Talk to you soon,
Lucia

On Wed, Apr 1, 2015 at 9:46 AM, Elodie
PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Lucia

Please forgive my intrusion. I
requested your email address from
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litigating against a photographer
whom is using a few of my
photographs illegally - one of which
has ended up being used for the
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umbrella company for Botox, Juvederm, and a few more plastic surgery related brands...) - yet while I was flipping through his catalog of royalty-free pictures online to account for how many pictures he had of me on his stock photography platforms, I came across 7 pictures of you. Below is one of them.



[REDACTED] have you ever shot with a photographer named Adrianna Williams, presumably based in LA? ...I have not. Yet, "she" is selling my pictures royalty-free on Getty Images and yours on Corbis. Go to Corbisimages.com and flip through, you will see the pictures that I am referring to (there are some on page 8, 11, 13, 14 and 15 if I am not mistaken).

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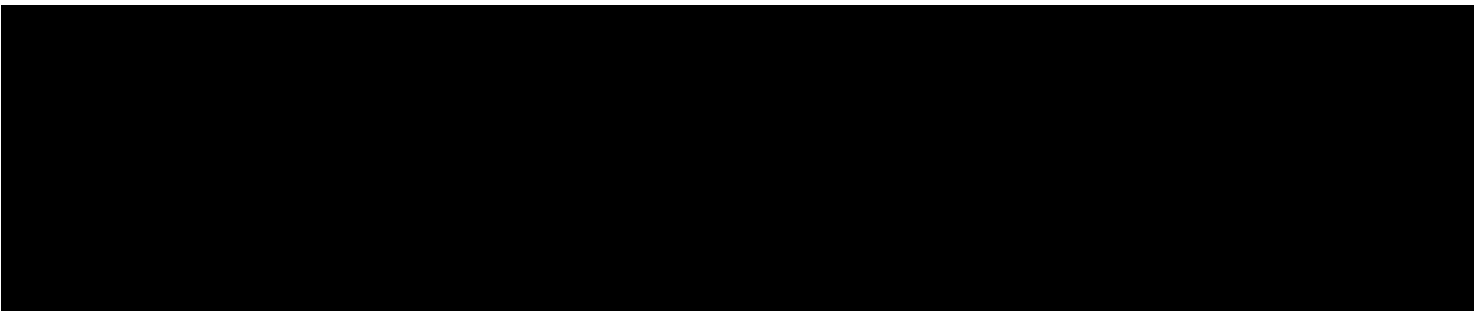




Sincerely,

Elodie.

Sent from my iPhone



From: elodiepass@hotmail.com
Subject: Re: Image used on CorbisImages.com
Date: Tue, 28 Jul 2015 15:10:21 -0400
To: fuersten@gmail.com

Hi Lucia!

Please let me know if you would like to discuss this further. I have a much more respected lawyer now.

Elodie.

Sent from my iPhone

On Apr 13, 2015, at 7:51 AM, Lucia Fiala <fuersten@gmail.com> wrote:

Elodie,

I am very sorry for not replying to this earlier!

Yes, there are many similarities, he pretty much told me the same. When you look at that release that I signed, to me it looks put together and photocopied later, however, at that time, it was very hard to fight back.

There might be some statutory limits for me to take this further, i am not sure - it has been forever... I do not have a release and it will be hard to get it for me as i am not on a good terms with my former agency (however, it was a shoot for a good housekeeping and i am sure there is some record of that somewhere).

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I had been working as a model for 12 years, but this never ever happened to me except for this idiot...

so please let me know if i can help you anyhow, but unfortunately i cannot sue him as well...;(

regards,
Lucia

On Wed, Apr 1, 2015 at 10:12 AM, Lucia Fiala
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Dear Elodie,

It is nice hearing from you! I will reply over the lunchtime, I cannot now.
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Now, have you ever shot with Bill Diodato? ...I have and he was the photographer on both jobs that the pictures being sold for stock in my case have been extracted from.

[REDACTED]



Sincerely,

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Sent from my iPhone



From: elodiepass@hotmail.com
Subject: Re: photos
Date: Wed, 1 Apr 2015 15:12:37 -0400
To: fuersten@gmail.com

Thank you so much Lucia. 


I will explain better after I am done with work.

Elodie.

Sent from my iPhone

On Apr 1, 2015, at 2:26 PM, Lucia Fiala <fuersten@gmail.com> wrote:

Hi Elodie,
See my conversation below with him....
Lucia

----- Forwarded message -----

From: **linda** <linda@billdiodato.com>
Date: Tue, Apr 22, 2008 at 8:13 AM
Subject: Re: photos
To: Lucia Fiala <fuersten@gmail.com>

Lucia,

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have chosen NOT to sign
a release as this is a pretty straight forward model release.

I would like to assure you that Bill has not scammed you nor has
anyone in
our office. Bill has
the utmost respect for his clients, the models he has
photographed and his
crew members.

I would appreciate it if you could pass on all other
correspondence to
Colleen or myself. We understand
your need to express your feelings to Bill, but he does not deal
with
issues such as; budgets, invoicing,
releases, contracts or legalities. Bill's responsibility to his clients
and our office is to create beautiful
photographs!

Should you have any further questions or concerns, please
contact Linda or
Colleen at 212-563-1724.

Respectfully,

Linda Hilfiker
Producer

linda@lhproduction.com

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Anyways, thank you for "being forthcoming with the information",

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		this (if you would like to contact either Linda or Colleen at the office 212-563-1724 they would be happy
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everything		by the book. We own the rights to the image and I have been informed that my agent can sell the image for anything they would like. As a courtesy to you (based on your displeasure) I offered to not sell
the		image for any sensitive issue topics. I would appreciate it if you would refrain from saying "I
scammed		you" or mislead you. It is not forged nor is it tampered with so please refrain from this slanderous communication. I have a great reputation
and		do not appreciate you negative comments and attacking nature. I have
been		very forthcoming with information, this is not the behavior of a scam artist...
		Finally, models that sign a release will cross out what he or she does
not		wish the image to be sold/used for and you did not do so. Hence your
image		and many others are being offered for sale by my stock agent.

Respectfully,
Bill Diodato

On Apr 20, 2008, at 6:51 PM, Lucia
Fiala wrote:

Bill,

I do not have the image in question,
since I never had it, and the
hard copy from the magazine is at
home in Slovakia...

It was a cheezy smile image in a
yellow top that you took while
shooting for the "Good
Housekeeping". As much as I
remember from that
shoot you asked me to sign the
release so you can use the images
for
your web site...the scan of the
contract is attached, although the
only readable part are the
signatures...

I am thankful, that you do not use
the images for the cigarettes,
drugs, etc....Finding myself in the ad,
that basically says, that I
look good for being 97 years old
because I drink the mineral water
was
humiliating. Not to mentioned, that I
wasn't paid for it, because you
scammed me...

I'm just shocked that I let this
happened to me, not to mentioned,
that when my lawyers started to
investigate in the matter, since I had
no idea where the picture in the ad
comes from, the mineral water

company started to threaten me
that they'll take me to the court, as
they claim, I harmed the good name
of the company...

Lucia

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wrote:

Hello lucia,

Assuming your image is being sold in
the stock arena as you have

mentioned,

you should
know that many agents contact
photographers looking for images
that are
sitting in the filling
cabinets so they may sell them. It is
a reality of our ever changing
business. Please send me the image
in question and I will look into this
ASAP.

I will also assure you that if my
image of you has been made
available

for

sale by a stock agent it can never be
sold for any sensitive matter such

as

fur, drugs, alcohol, medicine,
cigarettes or any sex related issues.
All of my images are barred from
these type of sales, so no I am not

that

desperate.

Where do you live? Are you in the
US?

Please send me a scan of the image
you are referring to.

Thank you,
Bill

On Apr 19, 2008, at 11:45 PM, Lucia
Fiala wrote:

Hi,

I didnt know you were so desperate,
that you chase the models at the
photoshoots with some strange
contracts written under German law
and
then sell the pictures to the
European agencies....You looked as a
decent photographer....

Anyways, can you tell me where
everywhere you sold my pictures to?
So

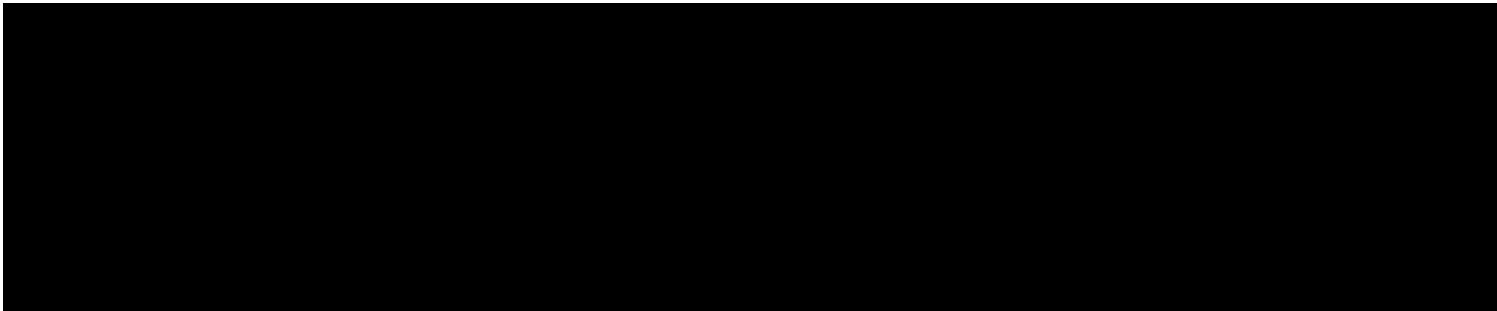
I can spare myself the problems and
the humiliation when trying to
trace the origin of the pictures that
appeared in a major ad for a
mineral water in the Czech and
Slovak Republic?

Thanks,
Lucia

<contract.pdf>

Bill Diodato Studio
212.563.1724
fax- 212.594.3603

<contract.pdf>



From: elodiepass@hotmail.com
To: bramphil@gmail.com
CC: elodiepass@hotmail.com
Subject: Getty link
Date: Thu, 18 Jun 2015 16:55:46 +0000

Hi again Phil!

...To simplify your search, here is the link for Adrianna Williams on Getty:

<http://www.gettyimages.com/search/photographer?excludenudity=true&family=creative&page=1&photographer=adrianna%20williams&phrase=&sort=best>

And here is the Corbis Images link:

<http://www.corbisimages.com/Search#pg=adrianna+williams>

Happy Thursday!


Elodie.

Date: Fri, 12 Jun 2015 22:13:02 -0400
Subject: Re: Gillette Unauthorized Use
From: bramphil@gmail.com
To: elodiepass@hotmail.com

Alright, sign me up.

On Fri, Jun 12, 2015 at 9:31 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Actually, Phil,



Elodie.

Sent from my iPhone

On Jun 12, 2015, at 8:28 PM, Phil Bram <bramphil@gmail.com> wrote:

Thanks, Elodie. Anything I can do to help even if I get nothing out of it. Phil.

On Fri, Jun 12, 2015 at 7:54 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Phil, this is what Bill Diodato does. [REDACTED]

I will contact you in more details soon. Thank you for being on board.

Elodie.

Sent from my iPhone

On Jun 12, 2015, at 7:50 PM, Phil Bram <bramphil@gmail.com> wrote:

FYI, I had absolutely no idea that he slipped that form into the release that day. I was shooting up to 3-4 jobs a week then and he put one past me. Dana reamed me out for it, for not paying attention, but it was a sinister move. Phil.

On Fri, Jun 12, 2015 at 7:43 PM, Phil Bram <bramphil@gmail.com> wrote:

Thank you!

On Fri, Jun 12, 2015 at 7:43 PM, Ali Grace Marquart <Ali.Grace@wilhelmina.com> wrote:

Completely agree, Phil.

I am copying Elodie on this email so you two can connect, [REDACTED]

If there's anything I can do to assist with this,

please let me know and I
will be happy to do so.

Best regards,
Ali

From: Phil Bram
<bramphil@gmail.com>

Date: Friday, June 12,
2015 7:41 PM

To: Ali Grace Marquart
<Ali.Grace@wilhelmina.com>

Subject: Re: Gillette
Unauthorized Use

Hi, Ali! This is great
news. This has been a
thorn in my side for
quite sometime [REDACTED]

[REDACTED] It's the principle
of the thing. I am on
board. Thanks for
reaching out. Phil.

On Fri, Jun 12, 2015 at
12:20 PM, Ali Grace
Marquart
<Ali.Grace@wilhelmina.com> wrote:

Hi Phil,

I hope
this
email
finds
you
well. I'
m not
sure if
you
remem
ber me,
but in

[REDACTED]

[REDACTED]

[REDACTED]

I have
been in
touch
with
another
model

[REDACTED]

[REDACTED]

Best
regards,
Ali

**Ali
Grace
Marqu
art**

General
Counsel

.....
.....
.....
.....

**Wilhelm
ina
Internat
ional,
Ltd.**

300 Park
Avenue
South
New
York,
New
York
10010
T: 212-
473-
0700 F:
646-

390-
3540

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"what's madness but
nobility of soul at odds
with circumstances?"
Theodore Roethke

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"what's madness but nobility of soul
at odds with circumstances?"
Theodore Roethke

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"what's madness but nobility of soul at odds with
circumstances?" Theodore Roethke

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"what's madness but nobility of soul at odds with circumstances?" Theodore
Roethke

--
"what's madness but nobility of soul at odds with circumstances?" Theodore Roethke



Date: Thu, 18 Jun 2015 13:21:09 -0400
Subject: Re: Bill Diodato
From: bramphil@gmail.com
To: elodiepass@hotmail.com

I'm on page 3 on the Corbis.

On Thu, Jun 18, 2015 at 12:56 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Just sent you the links... It was hard for me to find too.

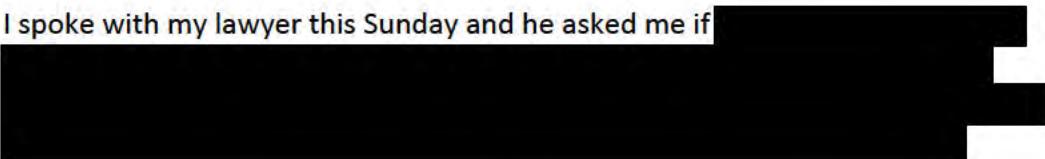
Date: Thu, 18 Jun 2015 12:53:56 -0400
Subject: Re: Bill Diodato
From: bramphil@gmail.com
To: elodiepass@hotmail.com

can't seem to find anything under than name on either. sorry.

On Thu, Jun 18, 2015 at 12:43 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Phil,

I spoke with my lawyer this Sunday and he asked me if



Thank you in advance for looking into this.

Elodie.

Sent from my iPhone

--

"what's madness but nobility of soul at odds with circumstances?" Theodore Roethke

--

"what's madness but nobility of soul at odds with circumstances?" Theodore Roethke

Date: Wed, 15 Jul 2015 00:19:39 -0400

Subject: Re: Did you find any pictures of yourself on the Getty or Corbis Images websites?

From: bramphil@gmail.com

To: elodiepass@hotmail.com

Yes, that is me. Okay. thanks, I will contact him.

On Tue, Jul 14, 2015 at 10:44 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Hi Phil!

Well, this is great

Good night!

Elodie.

PS: This is you in the attachment, correct?

Date: Tue, 14 Jul 2015 18:52:33 -0400

Subject: Re: Did you find any pictures of yourself on the Getty or Corbis Images websites?

From: bramphil@gmail.com

To: elodiepass@hotmail.com

Please keep me posted.

On Tue, Jul 14, 2015 at 6:47 PM, Phil Bram <bramphil@gmail.com> wrote:

I'm on page #3 of the Corbis.

On Tue, Jul 14, 2015 at 6:46 PM, Phil Bram <bramphil@gmail.com> wrote:

Hey, Elodie. I DID respond. Not sure why you didn't receive it. YES, I am on there!

On Tue, Jul 14, 2015 at 10:32 AM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Phil,

As I have not heard back from you, I was wondering if you could tell me whether you found yourself on either the Getty or Corbis Images websites.

Thank you for getting back to me at your convenience.

Just an FYI, the lawyer that I have retained for the Getty portion of this case (as my pictures only appear on the Getty website) is no other than the one whom fought for the Bernie Madoff victims to get some form of class action compensation: he is an amazing lawyer and a good person all in one.

Elodie.

--

"what's madness but nobility of soul at odds with circumstances?"
Theodore Roethke

--

"what's madness but nobility of soul at odds with circumstances?" Theodore
Roethke

--

"what's madness but nobility of soul at odds with circumstances?" Theodore Roethke

--
"what's madness but nobility of soul at odds with circumstances?" Theodore Roethke

Exhibit 13

Entry #	Date	Hours	Description
Thomas A. Canova			
1	6/5/2015	0.5	Emails with Max Assoulin and Elodie Passelaigue re new matter against Getty and photographer Bill Diodato; research re potential plaintiff
2	6/6/2015	1	Telephone discussion with Ms. Passelaigue, and review of her email re background of dispute
3	6/8/2015	0.25	Emails with Ms. Passelaigue, and conferences with JF, re new matter.
4	6/13/2015	1.5	Teleconference with JF and Ms. Passelaigue, follow up conference with JF, re new matter; emails with client re Clinique background.
5	6/18/2016	0.1	Emails with client and emails with MP.
6	6/22/2016	1	Begin review of research re causes of action.
7	6/26/2015	0.5	Confer with JF, emails with Ms. Passelaigue, re proceeding with new matter.
8	7/2/2015	2.75	Telecon with Ms. Passelaigue re class action billing procedures and proposed engagement letter agreement; related conference with JF; review cases and confer with MP re further legal research re causes of action
9	7/7/2015	1	Preparation of draft Engagement Letter, related emails with JF and client.
10	7/8/2015	0.25	Finalize Engagement Letter, related emails with client.
11	7/10/2015	3.25	Emails with client re executed Engagement Letter; related emails with JF; begin preparation of draft Complaint.
12	7/13/2015	2.5	Continue preparation of draft complaint.
13	7/14/2015	3	Continue preparation of draft complaint.
14	7/15/2015	2.75	Emails with Phil Bram re Corbis; related emails and conference with JF; continue review of legal research and review of draft Complaint.
15	7/16/2015	3	Telecon with MP and P. Bram re Diodato fraud; follow up conference with JF; continue review of legal research re causes of action.
16	7/23/2015	0.75	Emails with client re P. Bram and further details of case; telecon with client re further details of case; follow up internal conference.
17	9/14/2015	1	Review draft complaint and further legal research; related conference with MP
18	9/17/2015	0.25	Confer with MP re causes of action.
19	9/18/2015	3.5	Revisions to draft complaint.
20	9/21/2015	2.75	Revisions to draft complaint.
21	9/22/2015	3	Revisions to draft complaint.
22	9/23/2015	4	Finalize draft complaint for client review; email to client for same, identifying specific paragraphs for further discussion.
23	10/8/2015	0.25	Email to Phil Bram, emails with JF re [REDACTED]; emails with JF re Getty licenses, Lanham Act claim against Allergan
24	10/9/2015	0.5	Emails with P. Bram; telephone discussion with and emails to Kathy Geraghty (Images NYC owner) re pregnant Farley photo on Getty site
25	10/13/2015	0.5	Review of JF revised draft complaint; emails with JF [REDACTED]
26	10/14/2015	1.25	Telecon with client re allegations in draft complaint.
27	10/15/2015	3	Revisions to draft complaint.
28	10/16/2015	2	Revisions to draft complaint.
29	10/19/2015	2.5	Finalize next draft of complaint for client review; email to client re specific paragraphs for further discussion.
30	10/21/2015	0.5	Telephone discussion and emails with K. Geraghty re Farelly photo on Corbis.
31	10/23/2015	0.75	Emails with client re Lucia Fiala; telecon with client and MP re factual allegations in draft complaint
32	10/28/2015	0.25	Emails with JF re Getty corporate entities and license agreements.
33	11/4/2015	1.5	Revisions to draft complaint for JF and MP review.
34	12/7/2015	1	Continue preparation of complaint and related conferences with MP
35	12/9/2015	0.75	Continue preparation of complaint and related conferences with MP
36	12/28/2015	0.5	Confer with MP re redrafting of causes of action based on each element in statutes and leading cases
37	12/29/2015	1.5	Revisions to draft complaint causes of action
38	12/30/2015	1	Finalize next draft of complaint for client review; email to client re specific allegations for further discussion.
39	1/25/2016	1.5	Emails with client re [REDACTED]; conferences with JF and MP re confirming factual and legal support for each element of every cause of action.
40	2/10/2016	0.5	Confer with MP re finalizing all papers

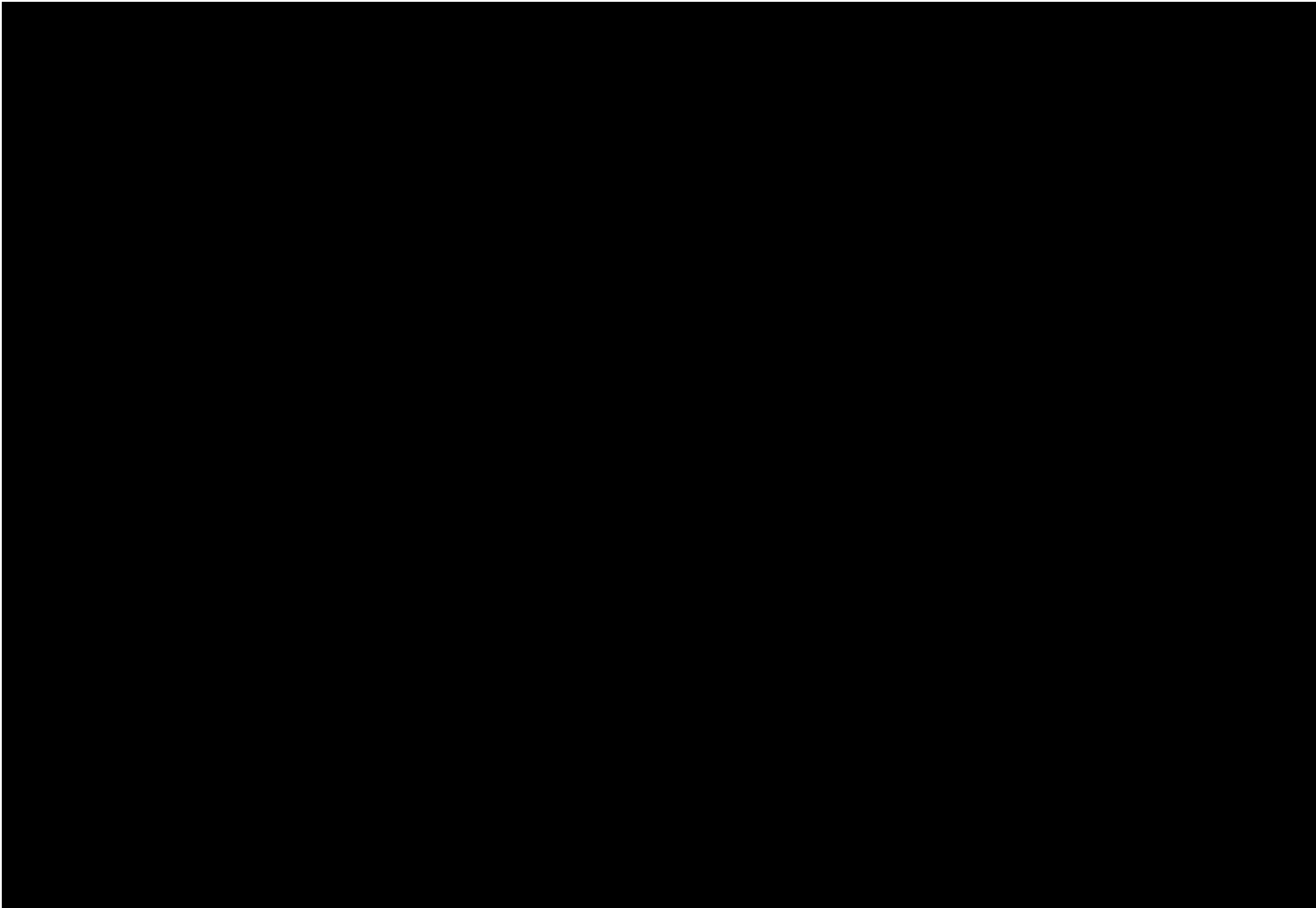
Entry #	Date	Hours	Description
41	2/11/2016	1	Finalize next draft of complaint for client review; email to client regarding newest revisions
42	2/12/2016	0.25	Confer with MP re filing procedures in SDNY.
43	2/22/2016	3.5	Attention to finalizing and filing Complaint and all papers to commence new action; related emails with client, and internal conferences.
	Subtotal =	63.1	
Melanie Persinger			
44	6/15/2015	0.3	discussing case with Jack and beginning investigation of claims
45	6/18/2015	0.1	reading email from client and followup emails from Tom
46	6/22/2015	7.2	researching potential causes of action
47	7/2/2015	0.3	discussing case with Tom, Tran, and Trevor; call to client
48	7/7/2015	0.7	discussing causes of action with Tom; reading email from Tom regarding case; and researching claims further based on discussion
49	7/8/2015	5	research re causes of action
50	7/9/2015	6.2	research re causes of action
51	7/10/2015	5.5	research for and drafting of Complaint, including discussing potential claims with Jack
52	7/13/2015	6	research for and drafting of Complaint
53	7/14/2015	7	research for and drafting of Complaint
54	7/15/2015	7.5	research for and drafting of Complaint
55	7/16/2015	6.8	research for and drafting of Complaint
56	7/16/2015	0.7	call with potential plaintiff/class member
57	7/17/2015	0.8	research for and drafting of complaint
58	7/23/2015	1	Call with Elodie regarding case investigation; follow up discuss with Jack and Tom
59	7/28/2015	4.7	research for and drafting of complaint
60	7/29/2015	2	research for and drafting of complaint
61	8/10/2015	4.7	edits to complaint and case investigation
62	8/11/2015	7.5	edits to complaint and case investigation
63	9/14/2015	1	discussing complaint with Tom; doing case research and saving relevant documents
64	9/17/2015	0.3	discussing case with Tom and saving relevant documents to file
65	9/29/2015	7.3	edits to complaint
66	9/30/2015	7	research for and edits to complaint
67	10/1/2015	7	research for and edits to complaint
68	10/2/2015	4.2	research for and edits to complaint
69	10/9/2015	0.1	reading emails from Jack and Tom; sending photo link to Tom
70	10/12/2015	0.2	discussing complaint with Jack and researching dates
71	10/14/2015	1.3	conference call with Elodie
72	10/22/2015	2.3	review of latest draft of complaint in preparation for call with client; call with client
73	10/23/2015	2.2	call with elodie to research facts for complaint, including reading relevant emails and follow up research
74	11/4/2015	0.8	review of current draft of complaint
75	11/24/2015	4.2	research for complaint
76	11/25/2015	5.7	research for complaint
77	12/1/2015	4.5	research for complaint
78	12/7/2015	2.8	discuss and draft complaint with tom
79	12/9/2015	1.5	discuss and draft complaint with tom
80	12/28/2015	2	drafting causes of action for complaint, including saving statutes and leading cases to file for Tom, and researching elements
81	12/29/2015	2.2	drafting causes of action for complaint both by myself and later in the day with Tom

Entry #	Date	Hours	Description
82	12/30/2015	2.6	research for and drafting of complaint; reading Tom's email to Elodie with complaint attached
83	1/25/2016	5.2	discuss complaint with Tom and edits to complaint; related conferences with TC and JF
84	2/10/2016	1.7	research and conference with TAC to discuss and assist in draft of complaint
85	2/10/2016	0.3	draft summons
86	2/12/2016	0.5	finalizing filing documents and researching filing procedures for SDNY, discussing same with Tom
87	2/22/2016	3	finalize all case initiation documents; check local rules and ECF rules re filing requirements to answer Tom's questions; file complaint and supporting documents
	Subtotal =	143.9	
Jack Fitzgerald			
88	6/13/2015	1	Call with Elodie Passelaigue regarding possible class action against Getty.
89	10/8/2015	0.6	Review draft Complaint.
90	10/12/2015	7.7	Revise draft Complaint and send to Mr. Canova to review.
91	10/14/2015	1	Call with Elodie Passelaigue, Mr. Canova, and Ms. Persinger to discuss case strategy, issues, and current draft of Complaint.
92	10/22/2015	1.5	Call with Elodie Passelaigue, Mr. Canova, and Ms. Persinger to discuss current Complaint draft and outstanding questions.
93	10/28/2015	0.3	Investigation concerning proper Getty entity to name as defendant, and locations of various Getty entities.
94	11/4/2015	2.2	Review and revise latest draft of Complaint and revert to Mr. Canova.
95	1/26/2016	0.4	Confer with Mr. Canova and Ms. Persinger regarding Complaint and [REDACTED].
96	2/12/2016	0.2	Review draft Complant and revise images and line spacing in certain places.
	Subtotal =	14.9	
	Total =	221.9	

Entry #	Date	Hours	Description
Tom Canova			
97	2/26/2016	0.5	Emails regarding service on defendants and review of Proofs of Service; follow up related emails.
98	3/1/2016	0.75	Telecon with Getty/Diodato counsel N. Wolff and S. Sholder re extension of time to respond to complaint; emails confirming same; telephone discussion and email with Lauren Benward (signed Release as witness).
99	3/2/2016	0.1	Further emails with L. Benward.
100	3/3/2016	0.25	Email to client with update of developments
101	3/9/2016	0.1	Further emails with L. Benward; related emails with client.
102	3/11/2016	0.1	Review defs' letter motion to extend time for answer
103	3/15/2016	0.25	Review court's order granting extension of time to answer; emails with Getty counsel re scheduling telecon; related emails with client
104	3/16/2016	1	Telecon with defendants' counsel re results of their investigation; follow up internal conferences; emails with client re [REDACTED]
105	3/23/2016	0.25	Emails with client re Haley Higgins;
106	3/30/2016	1	Telephone discussion with Simone Awor re nudes on Corbis; preparation of related notes.
107	3/31/2016	2.5	Emails with client re continued investigation for other defrauded models; emails with Chris Ryan; review of images of Willy models on Getty; research re questioned document experts; related telephone discussions and emails with [REDACTED] and [REDACTED]; related emails with client; emails to potential experts.
108	4/1/2016	2.75	Continue research and emails re potential experts; review and analysis of defs' counsel letter re Rule 11, and supporting Benward and Hilfiker declarations; review of defs' counsel email re 2009 Spiegel invoice.
109	4/4/2016	0.5	Preparation of email report to client re Rule 11 letter and supporting declarations; further email to client re Spiegel invoice; emails with Mariel Booth.
110	4/5/2016	0.5	Review defs' counsel email with Miller declaration and 2004 Clinique invoice; emails with client re same; emails with client re Lucia Fiala;
111	4/6/2016	1	Telephone discussions with potential document and ink experts
112	4/11/2016	0.75	Review Court's Order and Notice of Initial Conference; emails with defs' counsel re required joint letter to the court and proposed case management plan; email status report to client.
113	4/12/2016	1	Review and analysis of defs' letter to Court requesting conference for filing of MTD; related conference with MP.
114	4/13/2016	0.5	Review draft letter to Court responding to defs' pre-motion conference request; preparation of related notes
115	4/14/2016	2	Review of Court order granting pre-motion conference and directing plaintiff response letter re proposed MTD; revisions to draft letter to Court re proposed MTD; related conference with MP; email from defs' counsel re required joint letter to Court with proposed Case Management Plan.
116	4/15/2016	2.25	Further revisions to and finalize letter to Court re defs' proposed MTD; related conference with MP; telecon with defs' counsel re required joint letter to Court with proposed Case Management Plan; follow up conference with MP.
117	4/18/2016	2.75	Begin preparation for 4/27 Initial Case Conference and pre-motion conference re defs' proposed MTD; confer with MP re same and re defs' threatened Rule 11 motion; revisions to and finalize draft required joint letter to Court for Initial Case Conference; related emails with defs' counsel.
118	4/19/2016	3.25	Emails with opposing counsel re defs' sections for joint letter to Court; revisions to same; further emails with defs' counsel re same; review and revisions to draft Case Management Plan; related emails with opposing counsel and revisions to same; telecon and emails with Richard Agudelo; review of defs' Corporate disclosure filings;
	Subtotal =	24.05	
Melanie Persinger			
119	2/23/2016	0.4	sending complaint, summons, ECF Rules & Instructions and Judge's Rules to AMS for service on 4 different defendants; responding to Tom's emails regarding same; taking call from AMS regarding same
120	3/10/2016	0.2	apply for SDNY ecf login; send letter to california supreme court for certificate of standing

Entry #	Date	Hours	Description
121	3/16/2016	0.1	scanning and saving POS for complaint; review email from Elodie
122	3/16/2016	0.7	call with opposing counsel to discuss her investigation of claims; review email from Elodie
123	3/17/2016	0.3	finalize and file motion for pro hac vice admission, including researching rules on chambers copies, scanning letter of good standing, and saving ECF stamped docs in Docket folder
124	4/5/2016	0.5	read emails; send Tom materials requested
125	4/11/2016	0.1	review emails from Elodie and Tom
126	4/12/2016	5	review letter requesting conference for leave to file pre-answer MTD; begin draft of response
127	4/13/2016	6.5	draft response letter to defendants' letter requesting conference to seek leave to file MTD
128	4/14/2016	3	conference with TC to discuss response to letter re MTD; edits to response letter; draft initial joint letter re Initial Conference; save template for case management statement and scheduling order and begin to fill out same; file response letter re MTD
129	4/18/2016	6	read rule 11 letter and declarations; conference with TC to discuss same as well as upcoming conference re MTD; research for and draft outline of arguments for next week's hearing
130	4/19/2016	4.5	research for and draft arguments relating to Rule 11 issues to be discussed at next week's hearing
131	4/19/2016	1.5	teleconference with Richard Agudelo and follow up conference with TC
	Subtotal =	28.8	
			Jack Fitzgerald
132	3/1/2016	0.6	Prepare and file Proof of Service of Summons and Complaint on Getty Images, Inc.; together with Mr. Canova, participate in telephone call with Getty counsel, Nancy Wolf.
133	3/8/2016	0.2	File proof of service of Summons and Complaint on Getty Images (US), Inc.
134	3/18/2016	0.2	Prepare and attempt to file proofs of service on Bill Diodato and Bill Diodato Photography, LLC (complete filing following day).
135	3/23/2016	1	Together with Mr. Canova and Ms. Persinger, telephone call with Elodie Passelaigue regarding phone call with Nancy Wolf and other case developments; confer with Mr. Canova and Ms. Persinger after call.

Exhibit 14



From: Brittany Dairo <Brittany.Dairo@wilhelmina.com>
Date: March 17, 2014 at 7:56:53 PM GMT+1
To: ELODIE PASSELAIGUE <elodiepass@hotmail.com>
Subject: Casting

Casting REQUEST CASTING (3/18/2014)
(03:20 PM - 03:20 PM)
Client: DONNA DESETA CASTING**MESSAGE**
Product: BOTOX
Location: DONNA DESETA CASTING
584 Broadway
Suite 1001
(Between Prince & Houston)
New York, NY 10012

Tel: 212-274-9696

Notes: *** REQUEST CASTING ***

Make up should be light and fresh (mascara, powder, gloss). They should wear a dark colored tank top.

EVALUATION period -in NY or LA

- a.) - 'Before' shoot and injection - week of April 14
- b.) - Follow -up evaluation visit to doctor - week of April 21, possible week of April 28 depending on doctor avail.
- c.) - 'After' shoot week of May 12

- Beauty print shoot - also week of May 12 - in LA

TV shoot dates TBD.

For the 'Evaluation Term' - \$10,000 +20%

Covers: a.) 'before' photo shoot, same day visit to doctor's office for product administration; b.) and evaluation visit, and: c.) 'after shoot.'

For the Print 'National Term' - \$40,000 +20%

Covers one wardrobe day, one hair prep day (if needed) one/two 12-hr 'beauty' shoot; and Use and Exclusivity as noted above.

For BTS/b-roll - SAG Industrial II contract at SAG scale. Three (3) year use term.

Hold-over, travel days (if any) - at \$500 +20%

TV - model/performer will be issued a standard scale SAG television contract, with all standard provisions. Player will be guaranteed a minimum of \$5,000 per fixed cycle, with all SAG earnings computed at 150% SAG scale.

TV use - anticipated national network, spot, cable, Industrial and all electronic media. All SAG earnings will be computed at 150% SAG scale.

B. - Terms/Conditions for 'National Term'

Use Term: Three (3) years from first use.

- One (possible 2 day) 12-hr print session.
- One (if needed) hair prep day.
- Industrial (behind-the-scene) film will be shot at print session (covered by SAG contract).


"Specifically, they cannot have had a BOTOX Cosmetic, Dysport or Xeomin injection within the past 4-6 months.

PLEASE CONFIRM!!

XOXOX

<winmail.dat>

Exhibit 15



From: Elodie PASSELAIGUE [mailto:elodiepass@hotmail.com]
Sent: Monday, March 28, 2016 3:24 PM
To: tom@jackfitzgeraldlaw.com; simone.awor@gmail.com
Cc: Elodie PASSELAIGUE <elodiepass@hotmail.com>
Subject: Introductory email

Dear Simone this is Mr Tom Canova - extraordinary lawyer,
Dear Tom this is my friend Simone - exceptional model an a great person as well,

As I explained to you Simone, Tom has helped me with a similar matter as the one we discussed. Please feel free to contact him at your leisure.

Tom, Simone has given me her green light to provide you with her contact information, therefore please feel free to reach out to her at your convenience.

With all my gratitude and affection to you both,

Elodie.

Exhibit 16

From: marielbooth@gmail.com
Subject: Re: Lawsuit 2
Date: Wed, 30 Mar 2016 18:05:56 -0400
To: elodiepass@hotmail.com

There's another girl I recognize by forget her name. She was with ford when I was. So we're kim and Sabina. Several years ago. Sabina lives in LA she's a successful actress now and kim is with elite. I screen shot all three.

Mariel Booth

On Mar 30, 2016, at 5:42 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Mariel,

It was lovely speaking with you and I am glad that we both see eye to eye on this.

Attached are the links to both the Getty and Corbis websites...

Within the next few minutes, I will follow up with an email introducing you to the legal team.

Gratefully,

Elodie.

<http://www.gettyimages.com/search/photographer?excludenudity=true&family=creative&page=1&photographer=adrianna%20williams&phrase=&sort=best>

<http://www.corbisimages.com/Search#pg=adrianna+williams&p=1>

> From: marielbooth@gmail.com
> Subject: Lawsuit 2
> Date: Wed, 30 Mar 2016 17:07:26 -0400
> To: elodiepass@hotmail.com

>

> Hey- also- some of these are not bill Diodato. They were a female photographer. Must be the same one. Those images are 10 years old.

>

> I definitely want in!

>

> Mariel Booth

>

From: marielbooth@gmail.com
Subject: Re: Lawsuit 2
Date: Wed, 30 Mar 2016 17:59:17 -0400
To: elodiepass@hotmail.com

I already found 2 girls I know and I'm not even halfway done the first link.

Sabina Gadecki
Kim Strother

I'm friends with both on Facebook. I'll keep looking.

Mariel Booth

On Mar 30, 2016, at 5:42 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Mariel,

It was lovely speaking with you and I am glad that we both see eye to eye on this.

Attached are the links to both the Getty and Corbis websites...

Within the next few minutes, I will follow up with an email introducing you to the legal team.

Gratefully,

Elodie.

<http://www.gettyimages.com/search/photographer?excludenudity=true&family=creative&page=1&photographer=adrianna%20williams&phrase=&sort=best>

<http://www.corbisimages.com/Search#pg=adrianna+williams&p=1>

> From: marielbooth@gmail.com
> Subject: Lawsuit 2
> Date: Wed, 30 Mar 2016 17:07:26 -0400
> To: elodiepass@hotmail.com
>
> Hey- also- some of these are not bill Diodato. They were a female photographer. Must be the
same one. Those images are 10 years old.
>
> I definitely want in!
>
> Mariel Booth
>

Exhibit 17



From: elodiepass@hotmail.com
Subject: Re: Images
Date: Tue, 12 Apr 2016 11:27:17 -0400
To: krisbuchholz@netscape.net

Hi Kris!

No worries at all. Enjoy your vacation - the Dominican Republic has a very special place in my heart. When you get back to the U.S., feel free to either call the legal team or call me directly.

Elodie.

Sent from my iPhone

On Apr 12, 2016, at 7:13 AM, Kris Buchholz <krisbuchholz@netscape.net> wrote:

Hi Elodie-

Sorry I haven't gotten back to you. I'm in the Dominican Republic on vacation with my family until the 17th. I will call you when I am back. Thank you again for telling Jen about this whole thing.

Speak to you soon,
Kris

Sent from my iPad

On Apr 11, 2016, at 12:55 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Kris,

I am not sure whether you received the email that I sent you two weeks ago in response to the March 30th communication that you had initiated. Since you seemed interested in moving forward with this, I am emailing you again in order to provide you with the contact information for the legal team in charge of the Adriana Williams case. Mr Tom Canova is my legal point of contact but he works with a team of well rounded, trustworthy and good hearted individuals that you

might eventually be in touch with. Please feel free to reach Tom directly - either via email or over the phone at the email address / phone number listed below.

Thank you most sincerely for being proactive about this,

Elodie.

Thomas A. Canova

The Law Office of Jack Fitzgerald, PC

Hillcrest Professional Building
3636 Fourth Avenue, Suite 202
San Diego, California 92103

(p) 619-692-3840

(f) 619-362-9555

www.jackfitzgeraldlaw.com

*Member, NY Bar; not admitted in CA

> Subject: Images

> From: krisbuchholz@me.com

> Date: Wed, 30 Mar 2016 16:40:00 -0400

> To: elodiepass@hotmail.com

>

> Hi Elodie-

> Thank you for telling Jen about the images. I had absolutely no idea that was happening! Please let me know what you need me to do.


> Thank you,

> Kris

>

> Sent from my iPhone

Exhibit 18



From: Tom Canova [mailto:tom@jackfitzgeraldlaw.com]
Sent: Sunday, February 28, 2016 1:52 PM
To: 'Lucia Fiala' <fuersten@gmail.com>
Cc: tom@jackfitzgeraldlaw.com
Subject: FW: Adrianna Williams

Hi Lucia

Just checking in to see if you



As a reminder, I sent to you links to those pages in my email below.

Best regards

Tom Canova

Thomas A. Canova

The Law Office of Jack Fitzgerald, PC
Hillcrest Professional Building
3636 Fourth Avenue, Suite 202
San Diego, California 92103

(p) 619-692-3840
(f) 619-362-9555

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*Member, NY Bar; not admitted in CA

From: Tom Canova [<mailto:tom@jackfitzgeraldlaw.com>]
Sent: Thursday, February 18, 2016 2:42 PM
To: 'Lucia Fiala' <fuersten@gmail.com>
Cc: 'Elodie PASSELAIGUE' <elodiepass@hotmail.com>; 'melanie@jackfitzgeraldlaw.com' <melanie@jackfitzgeraldlaw.com>; tom@jackfitzgeraldlaw.com
Subject: RE: Adrianna Williams

Dear Lucia

Thank you for making time today to discuss your experience with Bill Diodato.

Here is a link to the Corbis website pages for images attributed to Adrianna Williams as photographer.

<http://www.corbisimages.com/Search#pg=Adrianna+Williams&p=1>

And here is a link to the Getty website pages for Adrianna Williams photos as well.

<http://www.gettyimages.com/search/2/image?artist=adrianna%20williams&excludenudity=true&family=creative&license=rf&page=1&photographer=undefined&sort=best>

[REDACTED]

We really appreciate your willingness to assist us in this matter.

Thanks.

Best regards

Tom Canova

Thomas A. Canova

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Hillcrest Professional Building
3636 Fourth Avenue, Suite 202
San Diego, California 92103

(p) 619-692-3840

(f) 619-362-9555

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*Member, NY Bar; not admitted in CA

From: Lucia Fiala [<mailto:fuersten@gmail.com>]
Sent: Thursday, February 18, 2016 7:17 AM
To: Tom Canova <tom@jackfitzgeraldlaw.com>
Cc: Elodie PASSELAIGUE <elodiepass@hotmail.com>
Subject: Re: Adrianna Williams

Dear Tom,
My number is [REDACTED]
Thank you,
Lucia

On Thu, Feb 18, 2016 at 10:09 AM, Tom Canova <tom@jackfitzgeraldlaw.com> wrote:

Dear Lucia

Yes, 5pm EST is perfect

I can call you if you provide number, or you can reach me at [619-692-3840](tel:619-692-3840).

Thank you

Best regards

Tom

On Feb 18, 2016, at 7:05 AM, Lucia Fiala <fuersten@gmail.com> wrote:

Dear Tom,
Thank you for your email. Would 5pm EST today work for you?
Please let me know, if the timing does not work for you, we can discuss another time.

With best regards,
Lucia

On Wed, Feb 17, 2016 at 4:15 PM, Tom Canova <tom@jackfitzgeraldlaw.com> wrote:

Dear Ms. Fiala:

At Ms. Elodie Passelaigue's suggestion, we are writing to ask whether you would permit us to briefly discuss with you [REDACTED]

Please let us know whether you would permit us to call you, and if so what number we should use and a good time for us to call.

Much thanks

Tom Canova

Thomas A. Canova

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Hillcrest Professional Building

3636 Fourth Avenue, Suite 202

San Diego, California 92103

(p) [619-692-3840](tel:619-692-3840)

(f) [619-362-9555](tel:619-362-9555)

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*Member, NY Bar; not admitted in CA

From: Lucia Fiala [mailto:fuersten@gmail.com]
Sent: Wednesday, February 03, 2016 12:10 PM
To: Elodie PASSELAIGUE <elodiepass@hotmail.com>
Cc: <tom@jackfitzgeraldlaw.com> <tom@jackfitzgeraldlaw.com>
Subject: Re: Adrianna Williams

Dear Elodie,

My apologies for not replying sooner, I have been having some medical issues in the past months and have been quite distracted.

I somehow missed this I guess, so my pictures are on sale by Adrianna Williams?

Cheers,

Lucia

On Wed, Feb 3, 2016 at 1:29 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Lucia,

Would you please contact my lawyer Tom Canova about Corbis having your pictures up for sale by photographer Adrianna Williams? It would just help us tremendously.

Thank you in advance,

Elodie.

PS: Tom Caniva's email appears in cc. It is tom@jackfitzgeraldlaw.com.

Sent from my iPhone

Exhibit 19

[REDACTED]

----- Forwarded message -----

From: **Karol Marie** <karolsemail@gmail.com>

Date: Tue, Feb 9, 2016 at 11:43 AM

Subject: Re: Message from "Elodie Passelaigue" via your Flavors.me contact form

To: "elodiepass@gmail.com" <elodiepass@gmail.com>

Hello.

Thank you for reaching out to me. I gave no permission for anyone to have selling rights to these photos. I also do not know this photographer. I absolutely agree and want them removed or compensation.

Again, thank you for reaching out and letting me know this.

What should the next step be ?

Karol Marie

On Tuesday, February 9, 2016, Flavors.me <noreply@flavors.me> wrote:

Elodie Passelaigue - elodiepass@gmail.com - sent you the following message from Flavors.me:

Dear Karol,

I contacted Jen Tourigny at Willy on Friday to have your full name and my web search lead me to your website. Because I did not want to bug Jen with having to provide me and feel responsible for providing me with your email address, I am now contacting you here. Photographer "Adrianna Williams" has your pics for sale on Corbis and mine on Getty. [REDACTED]

If you would like to discuss this further, please contact me at:

elodiepass@gmail.com.

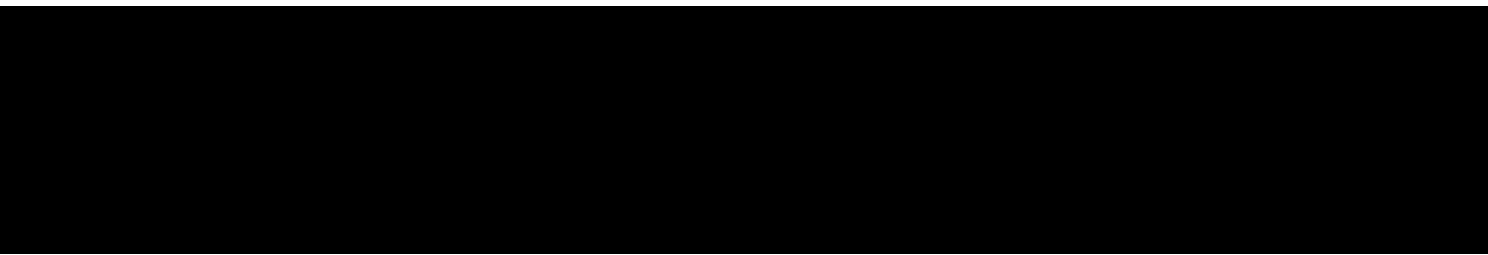
Also, just so you know that I am not someone passing for someone else, here is my website:
www.elodiepass.com.

Elodie.

PS: Here is the link to find your pics for sale on Corbis... I forget which page you are on.

<http://www.corbisimages.com/Search#pg=adrianna+williams&p=1>

Exhibit 20



From: Tom Canova [mailto:tom@jackfitzgeraldlaw.com]
Sent: Monday, March 07, 2016 10:12 AM
To: 'Lauren Benward Krause' <lauren@beltaneranch.com>
Cc: tom@jackfitzgeraldlaw.com
Subject: RE: 2004-2010

Lauren

Thanks for your email. I called this morning to briefly discuss this, and left you a VM.

Tom

Thomas A. Canova

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Hillcrest Professional Building
3636 Fourth Avenue, Suite 202
San Diego, California 92103

(p) 619-692-3840

(f) 619-362-9555

www.jackfitzgeraldlaw.com

*Member, NY Bar; not admitted in CA

From: Lauren Benward Krause [mailto:lauren@beltaneranch.com]
Sent: Wednesday, March 02, 2016 10:41 AM
To: tom@jackfitzgeraldlaw.com
Subject: Re: 2004-2010

Hi Tom,

That is definitely my signature and I checked my calendar. I did work on the Spiegel Job that day. I remember Elodie's name and I think I remember the necklace she is wearing in the top photo, but I don't recall the details of the agreement I witnessed. I wish her all the best,
Lauren

From: Tom Canova <tom@jackfitzgeraldlaw.com>
Organization: The Law Office of Jack Fitzgerald, PC
Reply-To: <tom@jackfitzgeraldlaw.com>
Date: Tuesday, March 1, 2016 3:04 PM
To: Lauren Benward <lauren@beltaneranch.com>
Cc: 'Jack Fitzgerald' <jack@jackfitzgeraldlaw.com>, <tom@jackfitzgeraldlaw.com>
Subject: RE: 2004-2010

Dear Ms. Krause

Further to our discussion today, attached is a copy of the release at issue.

Please give me another call at your convenience.

Much thanks

Tom Canova

Thomas A. Canova

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Hillcrest Professional Building
3636 Fourth Avenue, Suite 202
San Diego, California 92103

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(f) 619-362-9555

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*Member, NY Bar; not admitted in CA

From: Tom Canova [<mailto:tom@jackfitzgeraldlaw.com>]
Sent: Tuesday, March 01, 2016 2:37 PM
To: lauren@beltaneranch.com
Cc: Jack Fitzgerald <jack@jackfitzgeraldlaw.com>; tom@jackfitzgeraldlaw.com
Subject: 2004-2010

Dear Ms. Krause:

This is further to my voice mail message and my messages left with Ann and Missy for you over the past several days.

As I mentioned, I am an attorney on a case involving a photographer with whom you seem to have previously worked sometime between 2004 and 2010. [REDACTED]
[REDACTED]

I appreciate that you called me back yesterday, and am sorry I could not take the call at the time.

Perhaps we can schedule a call to briefly discuss this. Please let me know what would be a convenient time for you, and what number I should call. Of course, you can also call me at the number below.

I look forward to speaking with you.

Best regards

Tom Canova

Thomas A. Canova

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*Member, NY Bar; not admitted in CA

Exhibit 21

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: **Elodie Passelaigue** <elodiepass@gmail.com>

Date: Wed, Mar 23, 2016 at 4:59 PM

Subject: Re: Getty Photos

To: Haley Higgins <haleyp.higgins@gmail.com>

Dear Haley,

Thank you for getting back to me on this. Indeed, Wilhelmina's lawyer helped me in finding out that Bill Diodato was behind this. I too am very unhappy with Bill's doings as it seems to have become his modus operandi: a lot of my friend's pictures are up on either Corbis or Getty who never consented to having their likeness sold for stock.

This being said, I have retained an absolutely flawless legal team to help me with this. We have started a class action lawsuit last month for anyone whose pictures have been sold on Getty Images. Would you mind if my lawyer - Tom Canova of Jack Fitzgerald's law firm - contacted you via email to further explain [REDACTED]

[REDACTED]

[REDACTED]

Elodie.

On Wed, Mar 23, 2016 at 11:10 AM, Haley Higgins <haleyp.higgins@gmail.com> wrote:

Hi Elodie,

This is Haley Higgins from Willy NYC. My photos are for sale on Getty (without my consent) as well. I got your message on Facebook.

Anyway yes I know exactly who "Adrianna Williams" is as I got in a bit of a fight (over emails) and am upset about it myself.

The photographer is BILL DIODATO, he uses the "alias" Adrianna Williams as a fake name on their website...probably because he's embarrassed to be selling stock photos. I never remember Bill telling me he would use my image for this! I'm upset about it. If you or someone from the agency gets in touch with Bill Diodato, please tell him to remove our images from stock photos. He never responded to me.

Here's the information for someone from Getty's legal department (who I angrily emailed with). They refused to take my images down.

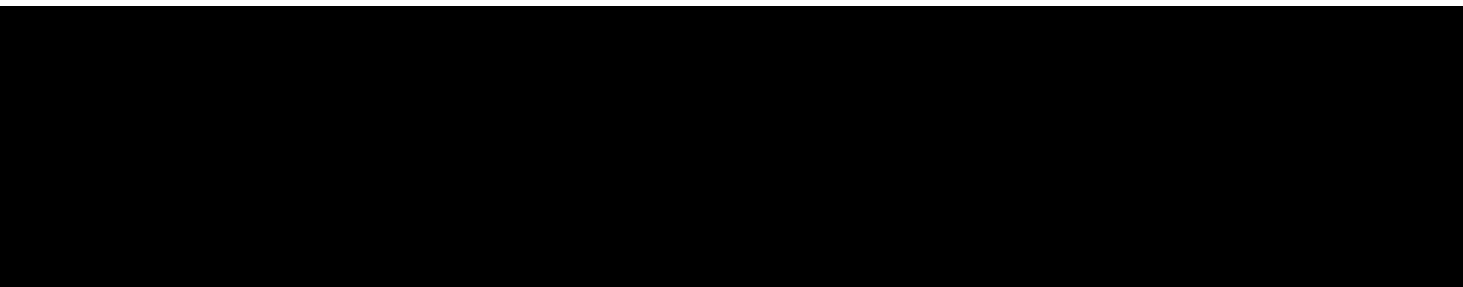
Heather Cameron
Director, Senior Paralegal
Getty Images, Inc.
605 5th Avenue S., Suite 400
Seattle, WA 98104
[206.925.6424](tel:206.925.6424) Direct
[206.925.5623](tel:206.925.5623) Facsimile
heather.cameron@gettyimages.com

Exhibit 22

[REDACTED]



> From: simone.awor@gmail.com
> Subject: Stock photos
> Date: Mon, 28 Mar 2016 15:15:10 -0400
> To: elodiepass@hotmail.com; elodiepass@me.com
>
> Hi Elodie,
>
> I went through my email, and I did document the incident. [REDACTED], but let's meet up
or chat on the phone soon. I would like to learn more about this a [REDACTED]
[REDACTED]
>
> Cheers,
>
> Simone
>
> [REDACTED]
>
> Sent from my iPhone

Exhibit 23



Subject: Re: Your photos on Corbis
From: simone.awor@gmail.com
Date: Mon, 28 Mar 2016 13:47:38 -0400
To: elodiepass@hotmail.com

Dear Elodie,

Thank you so much for sending this to me! I remember this shoot. It was for some beauty product and they specifically said the final images used would be implied nudity only. My nipples and full rear would Not be shown. I'll check if I still have the original email from that booker. Unfortunately, I don't know if that agency is still in business. I will do some work on my end and let's keep in touch with all of this. 




Talk soon,

Xx

Simone Awor

On Mar 28, 2016, at 1:29 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Simone,

As discussed, here are the pictures that I found of you on CorbisImages.com under the photographer named Adrianna Williams. Please 


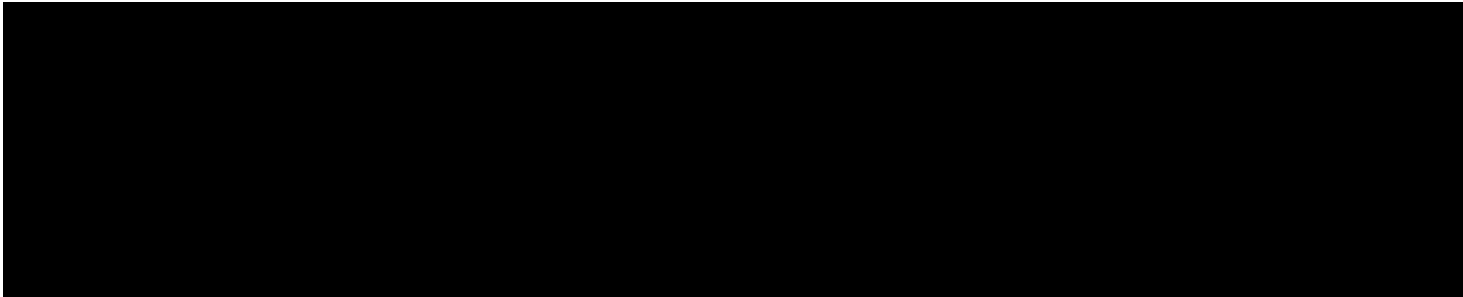
Have a great week,

Elodie.

<http://www.corbisimages.com/Search#pg=adrianna+williams&p=1>

<Simone1.tiff>
<Simone2.tiff>
<Simone3.tiff>
<Simone4.tiff>
<Simone5.tiff>
<Simone6.tiff>
<Simone7.tiff>
<Simone8.tiff>
<Simone9.tiff>
<Simone10.tiff>
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<Simone14.tiff>
<Simone15.tiff>
<Simone16.tiff>
<Simone17.tiff>
<Simone18.tiff>
<Simone19.tiff>
<Simone20.tiff>
<Simone21.tiff>
<Simone22.tiff>
<Simone23.tiff>
<Simone24.tiff>
<Simone25.tiff>

Exhibit 24



Subject: Re: Chris meet Tom Canova - brilliant lawyer, Tom meet Chris Ryan another one of my coworkers whom I had the pleasure of speaking with today
From: chrisryan80@gmail.com
Date: Thu, 31 Mar 2016 07:30:38 -0400
CC: tom@jackfitzgeraldlaw.com
To: elodiepass@hotmail.com

Thanks for passing along my info Elodie. Tom I would vey much like my pics to come down as well. Can we please schedule a time to speak further on this? I will have time later today or tomorrow at 2pm EST if that works for you? My cell is [REDACTED].

Thanks!
Chris Ryan

On Mar 30, 2016, at 11:44 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Chris, Dear Tom,

Please forgive the lateness: I was visiting apartments for a possible relocation, still I wanted for this email to be out before I went to sleep.

With both your consents, I am forwarding you one another's email addresses.

Chris, below you will also find Mr Canova's phone number and all the basic information with respect to the Jack Fitzgerald law firm.

Thomas A. Canova

The Law Office of Jack Fitzgerald, PC

Hillcrest Professional Building
3636 Fourth Avenue, Suite 202
San Diego, California 92103

(p) 619-692-3840

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*Member, NY Bar; not admitted in CA

[REDACTED]

[REDACTED]

[REDACTED]

Exhibit 25

[REDACTED]

From: Tom Canova [mailto:tom@jackfitzgeraldlaw.com]
Sent: Thursday, May 19, 2016 11:56 AM
To: tom@jackfitzgeraldlaw.com; 'Mariel Booth' <marielbooth@gmail.com>
Cc: tom@jackfitzgeraldlaw.com
Subject: RE: Getty/Corbis/Diodato - Engagement Letter

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Thomas A. Canova

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*Member, NY Bar; not admitted in CA

From: Tom Canova [<mailto:tom@jackfitzgeraldlaw.com>]

Sent: Monday, May 16, 2016 10:35 AM

To: 'Mariel Booth' <marielbooth@gmail.com>

Cc: tom@jackfitzgeraldlaw.com

Subject: Getty/Corbis/Diodato - Engagement Letter

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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*Member, NY Bar; not admitted in CA

From: Mariel Booth [<mailto:marielbooth@gmail.com>]

Sent: Wednesday, April 13, 2016 6:39 AM

To: <tom@jackfitzgeraldlaw.com> <tom@jackfitzgeraldlaw.com>

Subject: Re: Dear Mariel this is Mr. Tom Canova, Dear Tom this is Mariel Booth...

Hi Tom!

No worries! Life interferes :)

Let's talk after your mediation. I'll be up late. Or tomorrow works well too.

Thanks!

Mariel Booth

On Apr 12, 2016, at 7:59 PM, Tom Canova <tom@jackfitzgeraldlaw.com> wrote:

Hi Mariel

I am the one who dropped the ball. My sincere apologies.

I have a Mediation tomorrow in California, although I do not believe it will last all day.

I will text you when I know that it is concluding, so that I can see if you are available to chat.

Again, sorry I did not get back to you.

I look forward to speaking with you about your experience with Bill Diodato.

Best regards

Tom

Thomas A. Canova

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*Member, NY Bar; not admitted in CA

From: Mariel Booth [<mailto:marielbooth@gmail.com>]

Sent: Tuesday, April 12, 2016 4:51 PM

To: <tom@jackfitzgeraldlaw.com> <tom@jackfitzgeraldlaw.com>

Cc: Elodie PASSELAIGUE <elodiepass@hotmail.com>

Subject: Re: Dear Mariel this is Mr. Tom Canova, Dear Tom this is Mariel Booth...

Hi tom! I'm sorry we haven't connected yet! I'm not sure how we missed each other. I'm sure it's my fault. I'm available tomorrow to talk if you are in the afternoon. Thanks!

Mariel Booth

On Mar 30, 2016, at 8:53 PM, Tom Canova <tom@jackfitzgeraldlaw.com> wrote:

Dear Mariel

Thank you for your call today.

I look forward to our discussion tomorrow.

Best regards

Tom Canova

Thomas A. Canova

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(f) 619-362-9555

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*Member, NY Bar; not admitted in CA

From: Elodie PASSELAIGUE [<mailto:elodiepass@hotmail.com>]

Sent: Wednesday, March 30, 2016 3:15 PM

To: marielbooth@gmail.com; tom@jackfitzgeraldlaw.com

Cc: Elodie PASSELAIGUE <elodiepass@hotmail.com>

Subject: Dear Mariel this is Mr. Tom Canova, Dear Tom this is Mariel Booth...

Dear Mariel,

Let me introduce you to my extraordinary lawyer: Mr Tom Canova of the Jack Fitzgerald law firm.

As discussed, via this email I am officializing the introduction so that either of you can initiate contact at his/her convenience.

Mr Canova's number is listed below, his email address appears in contact.

Thank you for your time today,

Elodie.

Thomas A. Canova

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Hillcrest Professional Building

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San Diego, California 92103

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(f) 619-362-9555

www.jackfitzgeraldlaw.com

Dear Tom,

Above is Mariel Booth's email address. Her and I were able to speak over the phone today. Mariel used to work with Wilhelmina. She was contacted by our agent at Wilhelmina (Jen Tourigny) on this matter.

Tom, as always, I am most grateful for your help,

Elodie.

Exhibit 26

>

 \triangleright

>

 \triangleright \triangleright

Exhibit 27

[REDACTED]

[REDACTED]

From: elodiepass@hotmail.com
To: brittanyclybourn@gmail.com
CC: elodiepass@hotmail.com
Subject: RE: Illegal Use of Images
Date: Mon, 11 Apr 2016 16:41:07 +0000

Dear Brittany,

I am not sure if you received my email dated March 30th. In the absence of a response from you as to your preference of communication, I am emailing you the contact information for the legal team in charge of the Adriana Williams case. Mr Tom Canova is my point of contact but he works with a team of well rounded, trustworthy and good hearted individuals. Please feel free to reach Tom either via email or over the phone at the email address / phone number listed below.

Thank you for being proactive about this.

Sincerely,

Elodie.

Thomas A. Canova

The Law Office of Jack Fitzgerald, PC

Hillcrest Professional Building
3636 Fourth Avenue, Suite 202
San Diego, California 92103

(p) 619-692-3840

(f) 619-362-9555

www.jackfitzgeraldlaw.com

*Member, NY Bar; not admitted in CA

> From: brittanyclybourn@gmail.com

> Subject: Illegal Use of Images

> Date: Wed, 30 Mar 2016 17:43:21 -0400

> To: elodiepass@hotmail.com

>

> Hi Elodie,

>

> This is Brittany Clybourn from Wilhelmina. Topher had reached out to me about images that have been used illegally, and the legal action you are initiating. I would be interested in learning a bit more about the process.

>

> Thank you!

> Brittany Clybourn

>

>

Exhibit 28



From: elodiepass@hotmail.com
Subject: Re: Images Legal Action
Date: Wed, 30 Mar 2016 20:18:10 -0400
To: andressaxu@gmail.com

I will call you tomorrow morning.

Elodie.

Sent from my iPhone

On Mar 30, 2016, at 6:59 PM, Andressa Costa <andressaxu@gmail.com> wrote:

Give me a call whenever [REDACTED]

Sent from my iPhone

On Mar 30, 2016, at 6:20 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Andressa,

I can either call you to discuss this further or provide you directly with my legal team's information. Please let me know your preference.

And thank you for reaching out to me so promptly,

Elodie.

From: andressaxu@gmail.com
Subject: Fwd: Images Legal Action
Date: Wed, 30 Mar 2016 18:16:53 -0400
To: elodiepass@hotmail.com

Hi Elody,

Jen just shared with me your information about the legal action using our image illegally. This is crazy! Thank you so much for taking charge and let me know the details of the process.

Thank you and looking forward to talking to you,
Andressa Costa
[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: Jen Tourigny <Jen.tourigny@wilhelmina.com>

Date: March 30, 2016 at 4:36:37 PM EDT

To: "ANDRESSA COSTA (andressaxu@gmail.com)"
<andressaxu@gmail.com>

Subject: Images

Hey Andressa,

One of our models Elodie came across some of her images being used illegally and tracked them down to a photographer by the name of Adrianna Williams who was selling them via Getty and Corbis to clients such as Botox/Allergen/etc. She is now officially in litigation with her lawyer and this person. [REDACTED]

She has asked me to [REDACTED]

Her email is elodiepass@hotmail.com.

xx

<image001.jpg>

<image002.jpg> <image003.jpg> <image004.jpg> <image005.jpg>

<image009.png>

Jen Tourigny
Model Manager
Direct/Direct 2

300 Park Avenue South
New York, NY 10010
T: 212.473.0700
D: 212.473.4572
www.wilhelmina.com

BOOKING CONDITIONS

· **CANCELLATION POLICY:** ON CONFIRMED BOOKINGS; WITHIN THREE WORKING DAYS, FULL FEE. WITHIN FIVE WORKING DAYS, HALF FEE.

· **OVERTIME RATES:** TIME-AND-A-HALF APPLY BEFORE 9 A.M. AND AFTER 5 P.M. AND ON SATURDAYS, SUNDAYS AND HOLIDAYS. DAY RATE BASED ON AN 8 HOUR DAY.

- **TRAVEL RATE:** FULL FEE BETWEEN 9 A.M. AND 5 P.M. TIME-AND-A-HALF BEFORE 9 A.M. AND AFTER 5 P.M.
- **FITTING RATE:** PINNING OR ADJUSTMENT OF GARMENT, OR TRY ON OF TWO OR MORE GARMENTS; 1 HOUR MINIMUM
- **LINGERIE RATE:** APPLY FOR BRAS, PANTIES, SLIPS, PANTYHOSE, JOCKEY AND BOXER SHORTS, SLEEPWEAR, TRANSPARENT OR TRANSLUCENT ARTICLES; AGENCY MUST CHECK WITH MODEL BEFORE ACCEPTING ANY LINGERIE BOOKINGS. 1 HR MIN. CLOSED SET REQUIRED.
- **WEATHER PERMIT:** ON CONFIRMED BOOKINGS; ALL SAME DAY CANCELLATIONS- HALF FEE IF SERVICES ARE IMMEDIATELY RESCHEDULED; SERVICES NOT RESCHEDULED, FULL FEE. WEATHER PERMIT CANCELLATIONS MADE EARLIER ARE SUBJECT TO NORMAL CANCELLATION POLICY.
- **WEATHER PERMIT OPTIONS:** BOOK OR RELEASE WILL BE ENFORCED FOR OPTIONS WHEN SECONDARY JOB IS READY TO CONFIRM.
- **USE RIGHTS:** ARE LIMITED TO THE SPECIFIC RIGHTS GRANTED (ie. Geographic terms, # of pictures, media etc) AND MAY NOT BE EXTENDED WITHOUT NEGOTIATIONS.
- **AGENCY:** 20% AGENCY SERVICE CHARGE WILL BE APPLIED TO BILLINGS. A 2% FINANCE CHARGE WILL BE APPLIED TO BILLING UNPAID WITHIN 30 DAYS.

CLIENT RESPONSIBILITIES:

1. DISCLOSURE OF EXTRAORDINARY CONDITIONS OR REQUIREMENTS.
2. WHEN BOOKING WEATHER PERMIT, SPECIFY WEATHER CONDITIONS.
3. PROVIDE ADEQUATE DRESSING FACILITIES ON ALL BOOKINGS.
4. CHECK WITH AGENCY FOR ADVERTISING CONFLICTS.

Exhibit 29

No worries at all thx

Great, I'll call you then. Apologies for any inconvenience.

The Law Office of Jack Fitzgerald, PC
Hillcrest Professional Building
3636 Fourth Avenue, Suite 202
San Diego, California 92103

(p) 619-692-3840

(f) 619-362-9555

www.jackfitzgeraldlaw.com

*Member, NY Bar; not admitted in CA

From: Chris Ryan [<mailto:chrisryan80@gmail.com>]

Sent: Thursday, March 31, 2016 12:45 PM

To: tom@jackfitzgeraldlaw.com

Subject: Re: Images

I could do 5pm EST?

On Mar 31, 2016, at 3:43 PM, Tom Canova
<tom@jackfitzgeraldlaw.com> wrote:

Hi Chris

Would it be ok if I called you
tomorrow? If so, what is your
availability?

Tom

Thomas A. Canova

The Law Office of Jack Fitzgerald, PC

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3636 Fourth Avenue, Suite 202
San Diego, California 92103

(p) 619-692-3840

(f) 619-362-9555

www.jackfitzgeraldlaw.com

*Member, NY Bar; not admitted in CA

From: Chris Ryan [<mailto:chrisryan80@gmail.com>]
Sent: Thursday, March 31, 2016 9:53 AM
To: Tom Canova <tom@jackfitzgeraldlaw.com>
Subject: Fwd: Images

Tom please see links below -- I am in the Getty file only

Begin forwarded message:

From: Topher DesPres
<Topher.DesPres@wilhelmina.com>
Date: March 30, 2016 at 4:43:58 PM EDT
To: 'Traci Copeland'
<copelandt79@gmail.com>, Brittany Clybourn
<brittanyclybourn@gmail.com>, Haley Higgins <higgy1512@aol.com>, Chris Ryan <chrisryan80@gmail.com>
Subject: FW: Images

Hi guys – we discovered an agency using/selling your images illegally. Take a look at the attachments for examples. If you're interested in joining the lawsuit you can contact Elodie via below.

[REDACTED]
[REDACTED] Let me know if you need help or have qxs.

Exhibit 30

From: chrisryan80@gmail.com
Subject: Re: Images
Date: Wed, 30 Mar 2016 19:24:54 -0400
To: elodiepass@hotmail.com

Hi Elodie,

I just tried calling you -- my cell is [REDACTED] -- may be easier to have me contact your legal team so we don't play phone tag though. So if you want you can just send along their info as well.

Thanks!

On Mar 30, 2016, at 6:17 PM, Elodie PASSELAIGUE <elodiepass@hotmail.com> wrote:

Dear Chris,

Thank you for reaching out to me. You can either call me at [REDACTED] and we can discuss this, or I can provide you directly with my legal team's information.

Let me know your preference and thank you for being proactive on this front,

Elodie.

From: chrisryan80@gmail.com
Subject: Fwd: Images
Date: Wed, 30 Mar 2016 18:10:47 -0400
To: elodiepass@hotmail.com

Hi Elodie,

Thanks for finding this stuff for us! I would like the pics removed as well and be part of the suit. Please let me know what you need from me further. Thanks again.

Chris

Begin forwarded message:

From: Topher DesPres <Topher.DesPres@wilhelmina.com>
Date: March 30, 2016 at 4:43:58 PM EDT
To: 'Traci Copeland' <copelandt79@gmail.com>, Brittany Clybourn <brittanyclybourn@gmail.com>, Haley Higgins <higgy1512@aol.com>, Chris Ryan <chrisryan80@gmail.com>
Subject: FW: Images

Hi guys – we discovered an agency using/selling your images illegally. Take a look at the attachments for examples. If you're interested in joining the lawsuit you can contact Elodie via below. [REDACTED]

[REDACTED] Let me know if you need help or have qxs.

<image001.png>

Topher DesPrés
Director of Fitness
NYC / LA

.....
Wilhelmina Models NYC

300 Park Avenue South
Floor 2
New York, NY 10010
T: (212) 473-4572

Wilhelmina Models LA

9378 Wilshire Blvd #310
Beverly Hills, CA 90212
T: (310)601 2530
E: Topher@wilhelmina.com
wilhelmina.com

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From: Jen Tourigny
Sent: Wednesday, March 30, 2016 4:42 PM
To: Topher DesPres
Subject: Images

One of our models Elodie came across some of her images being used illegally and tracked them down to a photographer by the name of Adrianna Williams who was selling them via Getty and Corbis to clients such as Botox/Allergen/etc. She is now officially in litigation with her lawyer and this person. Upon further research she found other Wilhelmina models images listed on these sites.

She has asked me to [REDACTED]
[REDACTED]

Her email is elodiepass@hotmail.com.

xx

<CORBIS - WILLY MODELS.docx>

<GETTY - WILLY MODELS.docx>